

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

In re:

WILLIAM FRED BONHAM

CASE NO. 6:15-bk-01152-ABB

Debtor.

CHAPTER 13

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**OBJECTION TO CONFIRMATION OF PLAN**

Creditor, Rushmore Loan Management Services LLC as servicing agent for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2013-7, objects to Debtor's Plan and states:

1. Creditor holds a secured claim by virtue of its note and mortgage on the property located at 404 Launenburg Lane, Ocoee, Florida 34761.
2. Creditor intends to timely file a Proof of Claim ("Claim").
3. Creditor anticipates the Claim to reflect a total secured claim in the amount of \$429,420.91 along with pre-petition arrearage in the amount of \$143,251.67.
4. Debtor's Plan indicates an intention to mediate with Creditor through the Loss Mitigation Mediation Program.
5. However, as of the date of this Objection a motion for Referral to Loss Mitigation Mediation ("LMM") has not been filed.
6. Creditor has the right to inquire further into the Debtor's ability to be eligible for a loan modification either before or during the mediation process.
7. If a mediation is had and results in an impasse or denial of the modification, Creditor's claim should be paid in full or the property surrendered.
8. Moreover, Debtor's Plan should account for future taxes and insurance during the pendency

of the potential mediation.

9. Creditor reserves the right to supplement this Objection, as necessary.

**WHEREFORE**, Creditor respectfully requests the Court sustain its Objection and for such other and further relief as the Court deems appropriate.

Dated: March 10, 2015

/s/ Austin M. Noel  
Austin M. Noel, Esquire

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served by CM/ECF notice and regular mail to the parties below this 10th day of March, 2015.

**BUCKLEY MADOLE, P.C.**

/s/ Austin M. Noel, Esq.  
Austin M. Noel, Esq.  
Florida Bar Number 106539  
Buckley Madole, P.C.  
P.O. Box 22408  
Tampa, FL 33622  
Telephone/Fax: 813-774-6221  
bkfl@buckleymadole.com

**VIA REGULAR MAIL**

William Fred Bonham  
404 Laurenburg Lane  
Ocoee, FL 34761-4794

**VIA CM/ECF NOTICE**

Kevin E. Mangum  
Mateer & Harbert P.A.  
PO Box 2854  
Orlando, FL 32802-2854

**Chapter 13 Trustee**

Laurie K. Weatherford  
Post Office Box 3450  
Winter Park, Florida 32790